

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K.)	
Randolph), individually and under the Missouri)	
Wrongful Death Statute)	
)	
Plaintiff,)	
)	
vs.)	Case No: 1:21-CV-00160-SNL
)	
JENNIFER WILLIAMS, individually, et al.)	
)	
Defendants.)	

**CERTAIN DEFENDANTS' CONSENTED SECOND MOTION FOR ADDITIONAL
TIME TO RESPOND TO THE AMENDED COMPLAINT**

Come now Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law, Spain, Miller, Galloway & Lee, LLC and Bernice Haynes, by and through undersigned counsel, and for their Consented Second Motion for Additional Time to File Responsive Pleadings, Motions, and/or an Answers to Plaintiff's Amended Complaint, up through and including January 18, 2022, and state as follows:

1. On November 12, 2021, Plaintiff filed her Amended Complaint in this case.
2. Defendants requested, and were granted, additional time to file responsive pleadings, motions, and/or an answers to the Amended Complaint up through and including January 10, 2022. (Docs. 12, 14, 16, 17, 19, and 23)
3. The Amended Complaint arises out from events that occurred in a domestic relations matter which began in 2013 and is ongoing. The Amended Complaint is seventy (70) pages long and includes two hundred-sixty-seven (267) paragraphs alleging wrongful death arising from the Defendants various conduct.

4. Defendants respectfully request an additional seven days, up through and including January 18, 2022,¹ to file responsive pleadings, motions, and/or an answers to the Amended Complaint.

5. The additional time is necessary to issues beyond the control of Defendants, including an unexpected medical emergency, unanticipated staffing issues and severe inclement weather conditions in the Missouri area.

6. Defendant's request for additional time is not done to prejudice any of the parties to this cause of action or to cause undue delay in these proceedings as there is no trial date or pending deadlines.

7. On January 6, 2021, Defendants received consent from Plaintiff's counsel via email for the additional time, up to January 18, 2022, to file responsive pleadings, motions, and/or an answers to the Amended Complaint.

WHEREFORE, Defendants respectfully request that this Court enter an Order extending the deadline for them to file responsive pleadings, motions, and/or an Answer to the Amended Complaint, up through and including January 18, 2022, and for such other relief as the Court deems necessary under the circumstances.

¹ January 17, 2022, is a court holiday.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

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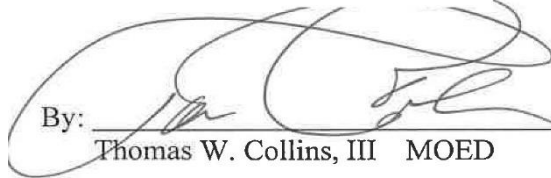
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By /s/ John C. Steffens (by consent)
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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, the foregoing was electronically filed with the Clerk of the Court using CM/ECF electronic filing system which will send notification of such filing to the following and email to all counsel of record:

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